In the Matter of:)
)
WRC-12 Advisory Committee) IB Docket No. 04-286
)
To: The Commission)

I support the Marine Radio Historical Society opposition to the adoption of those portions of IWG-1 Agenda Item 1.9 (Parts 1, 3, 4 and 6) and those changes proposed to Appendix 17, Part A that would have a severe negative impact on the operations of Station KSM and other stations around the world in the maritime service.

Agenda Item 1.9

IWG-1 Agenda Item 1.9, Parts 1, 3, 4 and 6, call on the FCC to support recommendations at WRC-12 that would have a severe negative impact on the operations of KSM and other coast stations using A1A and NBDP.

Specifically, the agenda item proposes to significantly reduce the number of assignable NBDP frequencies (Part 1), make digital data transmission primary in existing NBDP bands after 1 January 2015 (Part 3), re-designate frequencies assignable to stations using A1A Morse telegraphy to digital data transmission (Part 4) and remove the protection from interference that currently applies to stations using A1A Morse telegraphy (Part 6).

The provisions of Parts 2 and 3, and 6 if adopted, would permit users of digital data transmission to force stations duly licensed to use A1A and NBDP by the FCC to cease operation by claiming these stations are causing harmful interference.

These proposed changes would have a severe negative impact on the current operations of KSM and other stations by removing the protection from interference that currently and traditionally applies to stations in the maritime service, thereby eliminating the possibility of reception of KSM transmissions in many geographic areas.

At minimum, the frequencies currently assigned to KSM for A1A and NBDP, which are in active use, should continue to receive the protection from interference as they currently and traditionally enjoy.

Because only a few stations currently use A1A Morse and NBDP, the retention of the current and traditional protection against interference for these stations would represent, in the aggregate, only a VERY SMALL portion of the spectrum that would require protection. The retention of interference protection for these stations would thus have a negligible impact on the expanded use of digital data

transmission in the maritime service while at the same time allowing stations using A1A Morse and NBDP to continue their operations.

At minimum, the internationally recognized paired NBDP frequencies known as channels 23, 34 and 105, as set forth in §80.361 of the Rules of the FCC, should be retained as coast station and ship frequencies and that protection against interference for these frequencies be retained.
The retention of these few frequencies would represent, in the aggregate, only a very small portion of the spectrum requiring protection. The retention of interference protection
for these frequencies would thus have a negligible impact on the expanded use of digital data transmission in the maritime service while at the same time allowing stations using
NBDP to continue their operations.

The wholesale elimination of the A1A Morse calling and working frequencies and the imposition of digital data transmission on these frequencies would make it impossible to receive calls from ships due to massive interference and thus would have a severe negative impact on the operation of KSM and other stations using A1A Morse.

This capability could be extremely important in case of an emergency at sea or large scale disaster such as a hurricane or typhoon.

Certain proposed changes to Part A (Table of subdivided bands 4000 kHz. to 27500 kHz) of Appendix 17 call for the elimination of the current A1A Morse code calling and working frequencies within the referenced bands. Specifically, the proposed changes would make these A1A Morse code calling and working frequencies assignable to ship stations for digital data transmission.

The wholesale elimination of the A1A Morse calling and working frequencies and the imposition of digital data transmission on these frequencies would make it impossible to receive calls from ships due to massive interference and thus would have a severe negative impact on the operation of KSM and other stations using A1A Morse.

Additionally, The adoption of the recommendation to eliminate the A1A Morse calling and working frequencies would deny stations using this mode useful access to their duly licensed channels without compensation for loss of this access or for the cost of shifting to new channels, if indeed any such new channels would be available if this recommendation were adopted.

The retention of only a small number of A1A Morse calling and working frequencies over the entire spectrum would be sufficient to allow the continued operation of KSM and other stations using A1A Morse.

The internationally recognized worldwide calling frequencies known as ITU channel 3 in each band be retained as A1A Morse calling frequencies and that protection against interference for these frequencies be retained. Additionally, the internationally recognized series of working frequencies known as W1 be retained as A1A Morse working frequencies and that protection against interference for these frequencies be retained.

The retention of interference protection for these frequencies would thus have a negligible impact on the expanded use of digital data transmission in the maritime service while at the same time allowing stations using A1A Morse to continue their operations.

Given the narrow occupied bandwidth of A1A Morse, the retention of these few calling and working frequencies would represent, in the aggregate, only a very small portion of the spectrum requiring protection.

In conclusion, The adoption of the recommendations for WRC-12 as they currently stand would have a severe negative impact on the on the operations of KSM and other stations using A1A Morse and NBDP. However with only minor changes to these recommendations, the operation of these stations could continue with negligible impact on the expansion of digital data transmission in the maritime service.

Respectfully submitted

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